

SEYFARTH SHAW LLP
Kristina M. Launey (SBN 221335)
klauney@seyfarth.com
Eric Suits (SBN 232762)
esuits@seyfarth.com
Jeffrey A. Nordlander (SBN 308929)
jnordlander@seyfarth.com
400 Capitol Mall, Suite 2350
Sacramento, California 95814-4428
Telephone: (916) 448-0159
Facsimile: (916) 558-4839

Attorneys for Defendant
THE JACKSON LABORATORY dba THE JACKSON
LABORATORY, WEST

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

HEATHER SALAS-KEEN, individually, and on
behalf of other members of the general public
similarly situated,

Plaintiff,

v.

THE JACKSON LABORATORY dba THE
JACKSON LABORATORY, WEST, a Maine
corporation; and DOES 1 through 100, inclusive,

Defendants.

Case No. 2:21-cv-01032-JAM-AC

JOINT STIPULATION AND ORDER

Complaint Filed: May 4, 2021

The parties, Plaintiff HEATHER SALAS-KEEN (“Plaintiff”) on behalf of herself and others similarly situated, by and through her counsel of record and Defendant, THE JACKSON LABORATORY dba THE JACKSON LABORATORY, WEST (“Defendant”), by and through its counsel of record, hereby Stipulate and Agree as follows:

WHEREAS, on May 4, 2021, Plaintiff filed a Complaint in the Superior Court for the County of Sacramento, Case No. 34-2021-00300105, alleging causes of action for: (1) unpaid overtime; (2) unpaid meal period premiums; (3) unpaid rest period premiums; (4) unpaid minimum wages; (5) final wages not timely paid; (6) non-complaint wage statements; (7) unreimbursed business expenses; and (8) unfair business practices (the “Complaint”).

WHEREAS, on June 11, 2021, Defendant removed the Complaint to federal court under 28 U.S.C. § 1332(d)(2)(A) (Dckt. 1.).

WHEREAS, on July 12, 2021, Plaintiff filed a Motion for Remand (Dckt. 7.).

WHEREAS, the hearing on Plaintiff’s Motion for Remand is currently scheduled for September 28, 2021 (Dckt. 7.).

WHEREAS, the Parties have agreed to mediate this matter, and have secured a November 16, 2021, mediation date with Paul Grossman, Esq.

WHEREAS, the Parties have agreed to stay all formal litigation activities, including formal discovery, until after the mediation.

WHEREAS, the Parties further agree that continuing the hearing on the Motion for Remand until after the mediation date would allow the Parties the opportunity to focus on preparing for the mediation and focusing efforts toward a potential resolution of this matter.

WHEREAS, the Parties similarly wish to continue the deadline to submit the Joint Status Report, including the Rule 26(f) discovery plan, until after the conclusion of the mediation date as the information contained in the report will be more relevant after the mediation has concluded.

WHEREAS, no other dates have yet been scheduled in this matter.

THEREFORE, IT IS HEREBY STIPULATED by and between the parties as follows:

(1) All formal litigation activity shall be stayed until the conclusion of the November 16, 2021 mediation date.

(2) The Parties' deadline to file the Joint Status Report, including the Rule 26(f) discovery plan, shall be continued until December 16, 2021.

(3) The hearing on Plaintiff's Motion for Remand shall be continued to January 6, 2022, or any date thereafter subject to the Court's availability. All corresponding deadlines, including Defendant's deadline to file an Opposition to the Motion for Remand and Plaintiff's deadline to file a Reply shall be correspondingly continued.

IT IS SO STIPULATED.

DATED: July 20, 2021

Respectfully submitted,

SEYFARTH SHAW LLP

By:/s/ Eric Suits

Kristina M. Launey
Eric Suits
Jeffrey A. Nordlander

Attorneys for Defendant
THE JACKSON LABORATORY dba THE
JACKSON LABORATORY, WEST

DATED: July 20, 2021

Respectfully submitted,

JUSTICE LAW CORPORATION

By:/s/ Douglas Han

Douglas Han
Shunt Tatavos-Gharajeh

Attorneys for Plaintiff
HEATHER SALAS-KEEN

ORDER

The Court, having fully considered the Parties' Stipulation, HEREBY ORDERS as follows:

(1) All formal litigation activity shall be stayed until the conclusion of the November 16, 2021 mediation date.

(2) The Parties' deadline to file the Joint Status Report, including the Rule 26(f) discovery plan, shall be continued until December 16, 2021.

(3) The hearing on Plaintiff's Motion for Remand shall be continued to January 11, 2022 at 1:30 PM, or any date thereafter subject to the Court's availability. All corresponding deadlines, including Defendant's deadline to file an Opposition to the Motion for Remand and Plaintiff's deadline to file a Reply shall be correspondingly continued.

DATED: July 21, 2021

/s/ John A. Mendez

THE HONORABLE JOHN A. MENDEZ
UNITED STATES DISTRICT COURT JUDGE